

McINNIS LAW

521 FIFTH AVENUE, 17TH FLOOR ♦ NEW YORK, NY 10175-0038
TEL: (212) 292-4573 ♦ FAX: (212) 292-4574 ♦ CELL: (917) 903-9424

E-MAIL: TMCINNIS@MCINNIS-LAW.COM

WWW.MCINNIS-LAW.COM

June 19, 2018

By ECF filing

Hon. John G. Koeltl
U.S. District Court, S.D.N.Y.
500 Pearl Street
New York, NY 10007

Re: Fassi v. ArchCare, 15-CV-06871(JGK)

Dear Judge Koeltl:

I am counsel for plaintiff Denise Fassi and am submitting a joint request to modify the Rule 16 scheduling order in the above matter to permit the parties to complete fact witness depositions by July 13, 2018. Each sides needs to re-examine one of the other side's witnesses concerning documents produced as a result of the witnesses' prior deposition testimony, and Fassi needs to examine one of Defendant's employees and a third party witness whose testimony became particularly necessary because of other deponent's testimony. The July 13 date also takes into account the upcoming July Fourth Holiday and counsel's vacation schedule.

Respectfully submitted,

/s/ Timothy J. McInnis, Esq.

cc: Ernest R. Stolzer, Esq. (by ECF)